



May 11, 2011
Project No. 8128.01.08

Mr. Dana Bayuk
Oregon Department of Environmental Quality
2020 SW 4th Avenue
Portland, Oregon 97201-4987

Re: Monthly Progress Report—April 2011
Siltronic Corporation
7200 NW Front Avenue, Portland, OR
ECSI #183

Dear Dana:

Maul Foster & Alongi, Inc. (MFA) has prepared this progress report (Report) in accordance with the requirements of the *Order Requiring Remedial Investigation (RI) and Source Control Measures* (the Order), Oregon Department of Environmental Quality (DEQ) No. VC-NWR-03-16, issued to Siltronic Corporation (Siltronic) on February 9, 2004. The reporting period for this Report is April 1, 2011, through April 30, 2011. The next report is due June 10, 2011.

The report organization follows that of the previous progress reports.

ACTIONS TAKEN UNDER THE ORDER SINCE THE PREVIOUS PROGRESS REPORT

Communications

On April 8, 2011, DEQ provided comments requiring an addendum to the Supplemental Injection plan prior to implementation of the SIP.

On April 12, 2011, MFA provided the requested addendum to the Supplemental Injection plan and a revised SIP performance monitoring plan.

On April 13, 2011, DEQ provided direction to Siltronic and MFA regarding submittal of materials to DEQ and Water Resources Department variance requests.

On April 14, 2011, DEQ provided conditional approval of the April 12, 2011 addendum to the SIP.

On April 21, 2011, DEQ approved commencement of the SIP work.

On April 25, MFA provided a revised memorandum describing the results of MGP DNAPL sampling and analysis from monitoring well WS-33-81, and an accompanying letter requesting a meeting with DEQ to discuss this and other submittals.

Fieldwork

Group 1, 2, and 3 PMW monitoring continued through April. Monthly water levels were collected on April 12, 2011. The monthly water levels are included in the attached MS Excel file.¹

Measurements of dense, non-aqueous phase liquid (DNAPL) from former manufactured gas plant (MGP) operations were collected in selected Group 1 and 2 PMWs on April 12, 2011. DNAPL was not detected in the PMWs with one exception. MGP DNAPL was estimated (based upon staining on the bailer only) in WS-33-81 (approximate MGP DNAPL thickness: 0.05 ft). Due to a lack of volume, no sample was collected.

Implementation of the SIP program commenced on April 21, 2011.

Actions to Be Taken in the Next Two Months

Groundwater elevations and DNAPL thickness measurements will be collected in May and June. Performance monitoring in the Group 1, 2 and 3 wells will continue in June; performance monitoring in the Group 3 wells and the quarterly wells will continue in May.

MFA anticipates continuing injection through May and June.

TEST RESULTS AND DATA RECEIVED SINCE THE PREVIOUS PROGRESS REPORT

Data through the April 2011 sampling events has been received but validation is not yet complete. Consistent with DEQ comments, the content and format of data submittal memoranda evaluating these data will be developed following DEQ review of the updated and revised PMP.

The attached (electronic only) MS Excel data file contains all PMW and quarterly monitoring data received and validated through the end of the reporting period (April 30, 2011). As noted previously, RAO 1 for the source area has been met in all of the Group 1 and 2 PMWs.

PROBLEMS EXPERIENCED SINCE THE PREVIOUS PROGRESS REPORT

The removal and replacement of dedicated pumps during DNAPL screening continues to cause unnecessary strain on this equipment. Based on TCE data well below the injection threshold and the concomitant absence of TCE DNAPL, MFA recommends discontinuing the DNAPL screening program. No additional problems were experienced since the previous progress report.

¹ Includes monthly water levels from January-April 2011; water levels from preceding years have previously been submitted.


Mr. Dana Bayuk
May 11, 2011
Page 3

Project No. 8128.01.08


Please call either of us at (971) 544-2139 if you have questions or comments.

Sincerely,

Maul Foster & Alongi, Inc.



James G.D. Peale, RG
Senior Hydrogeologist



Ted Wall, PE
Oregon Operations Director

Attachments: PMW Data Received and Validated through Reporting Period and Water
Level Data—MS Excel file (electronic only)

cc: Tom McCue, Siltronic Corporation
Alan Gladstone, Davis Rothwell Earle and Xochihua
Chris Reive, Jordan Schrader Ramis
Jim Anderson, DEQ
Kristine Koch, EPA
Sean Sheldrake, EPA Seattle
Rene Fuentes, EPA Seattle
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